



AN ASSOCIATION OF ATTORNEYS

William I. Dok* (retired)
Bradford Baugh*
Valerie S. Tarvin*
Leah Moslchi Amini

Travis Krepelka
Hoover Krepelka
1570 The Alameda, Suite 101
San Jose, CA 95126

Re: Marriage of [REDACTED]

Dear Travis:

Enclosed please find my 17 item Request to Produce, Form Interrogatories and Substitution of Attorney.

I have reviewed your 171 item document request and ask you to go through it again and limit it. Of course you don't have to do that, but if you don't I will file a motion to quash because, to give one example, whether my client tells your client about his father's death is not likely to lead to discoverable evidence, let alone anything anyone says about anything in mediation.

Additionally, and I am only doing this as a general comment, please limit your requests to 3 - 5 years before your claimed date of separation, or mine. I have no intention of rebuilding things back to 1989 except at your client's prepaid expense, and if the court orders it.

Next, I think we need to establish date of separation. Would you stipulate to a bifurcation of that issue?

We need to get a custodial order in place. Pending that, would your client like the Thanksgiving holiday and second week of Christmas or would she prefer the first week of Christmas this year?

Travis Krepelka
September 27, 2013
Page 2

As to your inquiry about a private judge, since we have Mary Ann Grilli, why would anyone want a different judge?

As Mr. Roggia indicated to you earlier, [REDACTED] moving back into the [REDACTED] house until you can tell me why your client needs two residences simultaneously for her personal use.

Next, in my quick review of emails, your client appears to be complaining about being paid \$10,000 per month. Would she like me to put a stop to it? If she would, that can be arranged but for now, I am going to have my client continue to pay it and I will also have him pay \$5,370 which is as near as I can calculate it from Mr. Roggia's figures, is after tax support. Since there is no support order my client can't deduct anything he is paying and that with your client receiving \$10,000 taxable dollars, appears to be the right number. As to paying all your client's other bills he will not. In particular, if she wants to live [REDACTED] she will pay all of [REDACTED]. Similarly she will pay all her other expenses.

I understand your client is complaining about the parties son being paid. Would she like to pay the college tuition herself? With respect to college tuition I always encourage my clients to match dollar for dollar what the other side will pay. What amount per month is your client willing to pay out of her assets and my client will match it?

I understand your client has asked for a release of community property funds. First, we need to figure out what they are, and second I need an accounting from her of what she has helped herself to already. Once you provide me with that last number and identify an account I'm sure an advance can be arranged deducting what she has already self helped herself to.

Finally, I enclose a notice of taking deposition. It can be rescheduled for your convenience.

Very truly yours


BRADFORD BAUGH

BB/cfg
Encls.
cc: [REDACTED]